

June 14, 2004  
Case No. PHF 99,548 (7790/275)  
Serial No.: 09/587,394  
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**REMARKS**

**Specification.** In the Non-Final Office Action dated March 11, 2004, Examiner Patel objected to the specification for unnecessarily including the word "employ" at the end of the paragraph beginning at page 13, line 27 of the Substitute Specification. The Applicant has amended the Substitute Specification to delete the word "employ". Withdrawal of the objection to the specification is therefore respectfully requested.

**Claims 16-29.** In the Non-Final Office Action dated March 11, 2004, Examiner Patel rejected pending claims 16-29 on various grounds. The Applicant responds to each objection and rejection as subsequently recited herein, and respectfully requests reconsideration and further examination of the present application under 37 CFR § 1.112:

A. Examiner Patel rejected claims 18-25 and 28 under 35 U.S.C. §112, ¶2 as being indefinite

The Applicant respectfully traverses this indefiniteness rejection of claims 18-25 and 28. First, the Applicant uses the ordinary meaning of the terms "law of location", "city block distance" and "law of filiation" as known in the art in the description of the present invention and in recitation of the terms in claims 18-25 and 29. Thus, there is no need to redefine the terms. Second, the limitation "a law of filiation according to which said determined second point (child) becomes a possible further first point (father) of the front for further forwarding the front" as recited in independent claim 29 clearly recites the purpose for converting a child to a father is to further forward the front.

Withdrawal of the rejection of claims 18-25 and 29 under 35 U.S.C. §112, ¶2 as being indefinite is therefore respectfully requested.

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B. Examiner Patel rejected claim 16, 17 and 28 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,067,166 to *Ito*

The Applicant has thoroughly considered Examiner Patel's remarks concerning the patentability of claims 16, 17 and 28 over *Ito*. The Applicant has also thoroughly re-read *Ito*. To warrant this anticipation rejection of claims 16, 17 and 28, *Ito* must show each and every limitation of independent claims 16 and 28 in as complete detail as is contained in independent claims 16 and 28. See, MPEP §2131. The Applicant respectfully traverses this anticipation rejection of claims 16 and 28 because *Ito* fails to disclose and teaches away from "marching a front of points forward starting at a predetermined start point until a predetermined end point of the grid is reached to thereby identify at least one track formed by succeeding points denoted fathers and corresponding children of the threadlike structure" as recited in independent claim 16, and "means for setting end points within the image of potentials, the end points including a start point and an end point between which a path following the threadlike structure is to be determined" as recited in independent claim 28.

Specifically, *Ito* teaches a path of each label sequence (i.e., track) is known prior to front marching along a track to determine a length of the track. See, Ito at column 5, line 51 to column 6, line 19. For example, as shown in FIG. 2 of *Ito*, a track "afhik", a track "abcd" and a track "apq" are known prior to front marching along these tracks to determine the length of these tracks. Thus, the tracks are not determined as a function of the front marching from a start point to an end point as required by independent claims 16 and 28, because the tracks are known prior to the front marching.

Withdrawal of the rejection of independent claims 16 and 28 under 35 U.S.C. §102(b) as being anticipated by *Ito* is therefore respectfully requested.

Claim 17 depends from independent claim 16. Therefore, dependent claim 17 includes all of the elements and limitations of independent claim 18. It is therefore respectfully submitted by the Applicant that dependent claim 17 is allowable over *Ito*.

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for at least the same reasons as set forth herein with respect to independent claim 16 being allowable over *Ito*. Therefore, withdrawal of the rejection of dependent claim 17 under 35 U.S.C. §102(b) as being anticipated by *Ito* is respectfully requested.

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**SUMMARY**

The Applicant respectfully submits that claims 16-29 as listed herein fully satisfy the requirements of 35 U.S.C. §§ 102, 103 and 112. In view of the foregoing, favorable consideration and early passage to issue of the present application is respectfully requested. If any points remain in issue that may best be resolved through a personal or telephonic interview, Examiner Patel is respectfully requested to contact the undersigned at the telephone number listed below.

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Respectfully submitted,  
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